

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

FILED

AUG 06 2001

IN THE MATTER OF THE PETITION OF INDIANA)
BELL TELEPHONE COMPANY, INCORPORATED,)
D/B/A AMERITECH INDIANA PURSUANT TO)
I.C. 8-1-2-61 FOR A THREE PHASE PROCESS FOR)
COMMISSION REVIEW OF VARIOUS)
SUBMISSIONS OF AMERITECH INDIANA TO)
SHOW COMPLIANCE WITH SECTION 271(c) OF)
THE TELECOMMUNICATIONS ACT OF 1996)

INDIANA UTILITY REGULATORY COMMISSION

CAUSE NO. 41657

AMERITECH ADVANCED DATA SERVICES OF INDIANA, INC.
d/b/a SBC ADVANCED SOLUTIONS, INC.'S VERIFIED
SUPPLEMENTAL MOTION TO STAY IMPLEMENTATION

Ameritech Advanced Data Services of Indiana, Inc. d/b/a SBC Advanced Solutions, Inc. ("AADS"), by counsel, respectfully supplements its Verified Motion to Stay Implementation (the "Verified Motion") filed with the Indiana Utility Regulatory Commission ("Commission") on July 27, 2001, pursuant to 170 IAC 1-1.1-12(a)(5) and - 26(a) and Ind. Trial Rule 62. The Verified Motion requested the Commission to stay, pending appeal, the implementation of that Order issued by the Commission in this Cause No. 41657 on June 27, 2001 ("Appealed Order"), that provides, in part, "that the scope of the Indiana third-party OSS test should be expanded to include a test of Ameritech's DSL resale offerings consistent with the findings above." *In the Matter of the Petition of Indiana Bell*, Cause No. 41657, Order on EDR-1, page 5 (Ind.U.R.C. June 27, 2001). In support of this Supplemental Motion, AADS would show the Commission as follows:

1. AADS filed its Petition to Intervene and the Verified Motion in this Cause on July 27, 2001.

2. In the first quarter of the year 2002, AADS will migrate to a different operations support system ("OSS") for DSL Transport. AADS is implementing a different OSS to standardize the operating platform with that used in the other 8-state operating region. This change will allow AADS to better serve its customers.

3. At the time AADS filed the Verified Motion, it had not yet notified its customers of the impending change in its OSS. AADS sent notice letters of the impending change in OSS to CLECs with signed interconnection agreements on July 31, 2001. An illustrative copy of the notice letter is attached hereto and made a part hereof as Exhibit A. A similar letter was sent to Internet Service Providers.

4. As a result of AADS's migration to a new OSS in the first quarter of 2002, the test of AADS's present OSS will be rendered moot and unnecessary. Thus, mandatory testing of AADS's present OSS, pending appeal, wastes valuable AADS resources that could otherwise be dedicated to providing its customers with DSL Transport because AADS must create, administer and oversee two separate and distinct sets of tests for its DSL Transport OSS: one for its present OSS pending appeal and another one for the OSS that will be implemented in the first quarter of 2002 in the event the appeal remains pending or the Appealed Order is upheld.

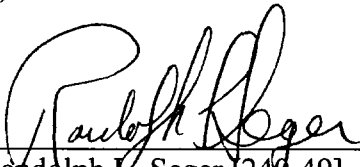
5. AADS will be significantly hampered in providing DSL Transport to its customers without a stay because AADS's operations and support personnel involved in providing service to AADS customers on the current OSS platform will be the same people involved with the OSS conversion and will also be the same personnel involved in any implementation of OSS testing. Without a stay of testing AADS's OSS, AADS will not be

able to devote the same level of personnel to its day-to-day operations as it currently provides.

WHEREFORE, Intervenor, Ameritech Advanced Data Services of Indiana, Inc. d/b/a SBC Advanced Solutions, Inc., for the reasons set forth herein and in its Verified Motion, respectfully requests the Indiana Utility Regulatory Commission to stay the implementation of the Commission's Order on EDR-1 in this Cause approved on June 27, 2001, pending the resolution of the appeal taken therefrom and for all other appropriate relief.

Respectfully submitted,

McHALE, COOK & WELCH, p.c.
1100 Chamber of Commerce Building
320 North Meridian Street
Indianapolis, Indiana 46204
(317) 634-7588

By: 
Randolph L. Seger [240-49]
David T. McGimpsey [21015-49]

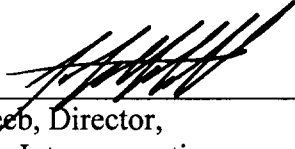
Attorneys for Ameritech Advanced Data Services of
Indiana, Inc. d/b/a SBC Advanced Solutions, Inc.

VERIFICATION

I affirm, under penalties for perjury, that the representations contained in the foregoing Ameritech Advanced Data Services of Indiana, Inc. d/b/a SBC Advanced Solutions, Inc.'s Verified Supplemental Motion to Stay Implementation are true and correct to the best of my knowledge, information and belief.

AMERITECH ADVANCED DATA SERVICES OF
INDIANA, INC. d/b/a SBC ADVANCED
SOLUTIONS, INC.

By: _____


John Habeeb, Director,
Regulatory-Interconnection

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served electronically upon the Ameritech 271 distribution list at Ameritech271@urc.state.in.us and upon the following counsel of record and other interested persons by United States Mail, first-class postage pre-paid, this 6th day of August, 2001.

Kris Kern-Wheeler, Esquire
Indiana Utility Regulatory Commission
Indiana Government Center South, Suite E306
302 West Washington Street
Indianapolis, Indiana 46204

Karol Krohn, Esquire
Office of Utility Consumer Counselor
Indiana Government Center North
100 North Senate, Room N501
Indianapolis, Indiana 46204

Mr. Jack R. Boheim
President
MTG Consulting
Post Office Box 2448
Mendocino, California 95460

Mr. Frank Darr
National Regulatory Research Institute
1080 Carmack Road
Columbus, Ohio 43210

Mr. John Kern
2300 North Barrington Road, Suite 400
Hoffman Estates, Illinois 60195

Michael J. Huston, Esquire
Michael E. Allen, Esquire
BAKER & DANIELS
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204

Robert K. Johnson, Esquire
Christopher C. Earle, Esquire
BOSE McKINNEY & EVANS
2700 First Indiana Plaza
135 North Pennsylvania Street
Indianapolis, Indiana 46204

Robert J. Aamoth, Esquire
Andrew M. Klein, Esquire
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W.
Washington, D.C. 20036

Nikki Gray Shoultz, Esquire
SOMMER & BARNARD, PC
4000 Bank One Tower
111 Monument Circle
Indianapolis, Indiana 46204

Richard E. Aikman, Jr., Esquire
Annette M. Engle, Esquire
STEWART & IRWIN, P.C.
251 East Ohio Street, Suite 1100
Indianapolis, Indiana 46204-2142

William Powers, Esquire
111 Monument Circle, Suite 302
Indianapolis, Indiana 46204

Douglas W. Trabaris, Esquire
Senior Attorney
AT&T Corporation
222 West Adams, 15th Floor
Chicago, Illinois 60606

William A. Haas, Esquire
McLeodUSA Telecommunications
Services, Inc.
McLeodUSA Technology Park
Post Office Box 3177
Cedar Rapids, Iowa 52406-3177

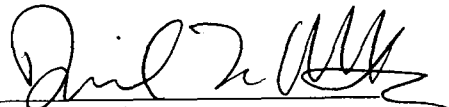
Ellyn Elise Crutcher, Esquire
Associate General Counsel
McLeodUSA Telecommunications Services, Inc.
121 South 17th Street
Mattoon, Illinois 61938

Charles R. Mercer, Jr., Esquire
Sprint Communications Company, L.P.
One North Capitol Avenue, Suite 540
Indianapolis, Indiana 46204

Pam Sherwood, Esquire
Vice President Regulatory Affairs,
Midwest Division
Time Warner Communications
4625 West 86th Street, Suite 500
Indianapolis, Indiana 46268

Bonnie K. Simmons, Esquire
AMERITECH INDIANA
240 North Meridian Street, Room 1831
Indianapolis, Indiana 46204

Peter J. Rusthoven, Esquire
Teresa E. Morton, Esquire
Michael R. Fruehwald, Esquire
BARNES & THORNBURG
11 South Meridian Street
Indianapolis, Indiana 46204


David T. McGimpsey

259705.1

EXHIBIT A

Notice Letter

**“(BUSINESS PROCESSES) Introduction of New OSS – Illinois, Indiana,
Michigan, Ohio, Wisconsin”**

Date: July 31, 2001

Number: **CLECASI01-001**

Contact: Scott Walker, (210) 246-8143

Category: All

In the first quarter of 2002, SBC Advanced Solutions, Inc. (SBC-ASI) will migrate to a new Operational Support System (OSS) for DSL Transport in Illinois, Indiana, Michigan, Ohio and Wisconsin (ASI-North). This will enable SBC-ASI to standardize its platform across the 13-state operating region. This more robust and scalable system combines multiple platforms into a single system and allows CLECs operating across SBC regions to use one standard interface with ASI.

At that time, ASI-North will discontinue offering DSL Transport using unbundled loops. Existing end-users served by unbundled loops will continue to operate, however, ASI-North will not accept any move or change orders.

After the OSS migration, ASI-North will offer DSL Transport on a line-sharing basis only. Line-shared DSL Transport is provisioned over an existing voice telephone line, which allows ASI-North to provide shorter installation intervals and significantly reduces the number of technical installation issues.

ASI-North will provide additional information, as it becomes available, regarding:

- Deadline for ordering new unbundled loops
- Maintenance procedures for existing unbundled loops
- Migration schedule for the new OSS
- Training, documentation, and support for the new OSS